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May 7, 2020

VIA ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Suris v. Gannett Co., Inc. d/b/a USA Today and Gannett Satellite Information Network, LLC d/b/a USA Today*, Case No. 20-cv-1793-BMC

Dear Judge Cogan:

We represent Defendants Gannett Co., Inc. and Gannett Satellite Information Network, LLC, and write with Plaintiff's consent respectfully to request an extension of Defendants' time to respond to the putative class action complaint, from May 14, 2020 until June 15, 2020. The reason for this request is that we were only recently retained and need time to investigate Plaintiff's allegations. This is Defendants' first request for an extension of its time to respond to the complaint.

This matter is currently scheduled for an in-person initial status conference on June 2, 2020. The parties jointly respectfully request that the conference be adjourned until a date convenient for the Court in July 2020, and that the parties have the option of appearing by telephone. There are currently no other dates scheduled in this matter.

We appreciate the Court's time and attention.

Respectfully submitted,

GREENBERG TRAURIG, LLP

A handwritten signature in blue ink that reads "Cynthia Neidl".

Cynthia E. Neidl

cc: Mitchell S. Segal, Esq.

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